

201-14886

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

**American
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December 9, 2003

Via US Mail and e-mail

Mr. Mike Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2211

RECEIVED
OPPT/CBIC
03 DEC 10 AM 11:00

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.
HPV Chemical Challenge Program Submission
1,3-diphenylguanidine (CAS number 102-06-7)**

Dear Mr. Leavitt:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 36 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find documents submitted by the Ministère de l'Environnement et de l'Aménagement du Territoire, representing France as the sponsor country for 1,3-diphenylguanidine (CAS no. 102-06-7) in the Organization for Economic Cooperation and Development (OECD) Screening Information Data Set (SIDS) program. The SIDS documents consists of the SIDS Initial Assessment Profile (SIAP), the SIDS Initial Assessment Report (SIAR) and robust summaries of studies conducted on 1,3-diphenylguanidine in an IUCLID-formatted document.

The conclusion of the SIDS review was that 1,3-diphenylguanidine is a candidate for further work, specifically testing in road dust to assess environmental concentrations of the compound resulting from abrasion of rubber compounds in motor vehicle tires. Such testing is beyond the scope of the US HPV Program.

This submission also is being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov



Mike Leavitt
RAPA-HPV
December 9, 2003
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If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments